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September 23, 2021

-Via ECF-

Chambers of Honorable Ronnie Abrams
Thurgood Marshall
United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

RE: Request for Adjournment of Status Conference
USA v. Sawtanter Dhaliwal
Case number: 1:20-cr-00579-RA

Dear Hon. Judge Abrams:

Our office represents Mr. Dhaliwal in the above-referenced matter. We respectfully request that the status conference scheduled for tomorrow, September 24, 2021 at 12:30 p.m. be postponed for two weeks in order for Mr. Dhaliwal to consider the government's proposed Plea Agreement, sent to us on August 26, 2021. If accepted, Mr. Dhaliwal would plea to Count Two of the above-referenced indictment, which charges him with aggravated identity theft, in violation of 18 U.S.C. §§ 1028A(a)(1), (b), and 2, an offense which carries a mandatory term of imprisonment of two years. The statutory minimum and maximum term of imprisonment Mr. Dhaliwal faces is 24 months imprisonment.

Although we have met with Mr. Dhaliwal twice since having received the Plea Agreement and extensively explained to him its terms and conditions, he remains undecided. We genuinely believe that given an additional two weeks we could then definitively inform the Court and the government whether to schedule a change of plea hearing or set the matter for trial.

We apologize for the inconvenience and thank you for your attention and consideration in this matter.

Application granted. The conference is adjourned to October 12, 2021 at 3:00 p.m. Time is excluded until October 12, 2021, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

SO ORDERED.



Ronnie Abrams, U.S.D.J. 9/23/2021

Respectfully Submitted,

LAW OFFICES OF ROBERT TSIGLER

/s/ Joseph Caldarera
Joseph Caldarera, Esq.

cc: AUSA Matthew King (via email, Matthew.King2@usdoj.gov)